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CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR, LLP Attorneys for Defendant American Export Lines 61 Broadway, Suite 3000 New York, New York 10006-2802 (212) 344-7042

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

OWOLABI SALIS

Plaintiff,

- against -

AMERICAN EXPORT LINES; and ATLANTIC CONTAINER LINE

Defendants.

ECF

Civil No.: 07 Civ 6164

AMERICAN EXPORT LINES'
CROSSCLAIM AGAINST ATLANTIC
CONTAINER LINES

Defendant American Export Lines through its attorneys Cichanowicz, Callan, Keane, Vengrow & Textor, LLP and for its crossclaim against Atlantic Container Lines alleges on information and belief as follows:

- 1. Repeats and realleges each and every admission, denial and denial of knowledge or information contained in its Answer to plaintiff's Complaint, with the same force and effect as if herein set forth at length.
- 2. If there was any loss or damage to the shipment referred to in the Complaint, which is denied, and said loss or damage caused any liability to Defendant American Export Lines, then the said liability was brought about by Defendant Atlantic Container Lines negligence and/or breach of contract and/or breach of warranties, implied or expressed, and by

reason thereof, Defendant American Export Lines is entitled to full indemnity and/or contribution from Defendant Atlantic Container Line, for the loss and damage including reasonable counsel fees and expenses.

WHEREFORE, Defendant American Export Lines prays that the Complaint against it be dismissed and its crossclaim be granted, and that the Court may grant such other or further relief as may be just and proper.

Dated: New York, New York July 31, 2007

Respectfully submitted,

CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR, LLP Attorneys for Defendant American Export Lines

By: / s / Stephen H. Vengrow Stephen H. Vengrow (SHV/3470) 61 Broadway, Suite 3000 New York, New York 10006 (212) 344-7042

To: Salis & Associates, P.C. 42 Broadway, Room 1133 New York, New York 10004 (212) 655-5749

> Mahoney & Keane 111 Broadway, Floor 10 New York, New York 10006 (212) 385-1422

CERTIFICATE OF SERVICE BY ECF AND BY REGULAR U.S. MAIL

The undersigned declares under penalty of perjury that the following is true and correct:

- 1. I am over the age of eighteen years and I am not a party to this action.
- 2. On July 31, 2007, I served a complete copy of **Defendant American Export Lines**Crossclaim against Atlantic Container Lines by ECF to the following attorneys at their ECF registered address and by regular U.S. mail at the following addresses:

Salis & Associates, P.C. 42 Broadway, Room 1133 New York, New York 10004 (212) 655-5749

Edward Keane, Esq. Mahoney & Keane Attorneys for KKK and K-Line 111 Broadway, 10th Floor New York, New York 10006 (212) 385-1422

/ s / Patrick Michael DeCharles, II
Patrick Michael DeCharles, II

DATED: July 31, 2007

New York, New York